

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)	
)	Criminal No. 1:19CR201
)	
v.)	
)	The Hon. Leonie M. Brinkema
)	
GEORGE AREF NADER,)	
Defendant.)	

PROTECTIVE ORDER RELATING TO ALLEGED
MINOR VICTIMS AND THIRD PARTIES

This matter is before the Court on a motion by the United States for a Stipulated Protective Order Relating to Alleged Minor Victims and Third Parties, restricting the disclosure and dissemination of documents, electronic records, and other information relating to alleged minor victims. The Defendant has joined in this motion. These documents, electronic records, and other information contain victim identifying information or potentially identifying information ("Victim Identifying Information") and shall be subject to this Order in accordance with Federal Rules of Criminal Procedure 16(d) (Discovery and Inspection) and 49.1 (Privacy Protections), and Title 18 United States Code Section 3509(d) (The Child Victims' and Child Witnesses' Rights Act) and Section 3771(a) (The Crime Victims' Rights Act).

For good cause shown, IT IS HEREBY ORDERED THAT:

1. Documents or electronic records containing Victim Identifying Information SHALL not be disseminated to the defendant or any third party without redaction;

2. All publicly filed or disseminated documents SHALL use a generic name to identify an alleged minor victim, such as “Minor Boy 1”;
3. Alleged minor victims SHALL be referred to by a generic name during all unsealed trial, pre-trial, and post-trial proceedings;
4. All papers to be filed in court that disclose the name of or any other information concerning a child SHALL be filed under seal without necessity of obtaining a court order. The person who makes the filing shall submit to the Clerk of the Court
 - (a) the complete paper to be kept under seal; and
 - (b) the paper with the portions of it that disclose the name of or other information concerning a child redacted, to be placed in the public record.
5. All documents and electronic records that contain Victim Identifying Information MUST be returned to the United States at the end of trial.


The United States’ Motion further requested that all documents and electronic records (and the information contained therein) obtained through discovery not be disseminated to third parties, other than as necessary for the defendant’s investigation of the allegations and the preparation of his defense. In addition, in the event that such documents, records, or information are brought outside secure office spaces for case-related purposes, the government would seek the redaction of personal identifying information as required by the local and federal rules: redaction of personal identifying information relating to unindicted individuals (including their names); and redaction of the telephone numbers, social media accounts, and email accounts of persons involved in law enforcement investigations.

For good cause shown, IT IS FURTHER ORDERED THAT:

6. All documents and electronic records (and the information contained therein) obtained through discovery SHALL not be disseminated to third parties, other than as necessary for the defendant's investigation of the allegations and the preparation of his defense.

7. In addition, in the event that such documents, records, or information are brought outside secure office spaces for case-related purposes, defense counsel SHALL redact any personal identifying information as required by the local and federal rules and also redact personal identifying information relating to unindicted individuals (including their names, addresses, dates of birth, social security numbers, telephone numbers, social media accounts, and email accounts).


IT IS SO ORDERED


/s/ 
Leonie M. Brinkema
United States District Judge

Date: July 19, 2019
Alexandria, Virginia

We ask for this:

G. Zachary Terwilliger
United States Attorney


Jonathan S. Jeffress
Counsel for Defendant

By: 
Jay V. Prabhu
Laura Fong
Assistant United States Attorneys